

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOHNJUAN WHITE, as Administrator	:	NO.: 1:22-cv-01241-CCC
of the ESTATE OF JIMMY KING,	:	
Deceased,	:	CIVIL ACTION – LAW
Plaintiff	:	
	:	JUDGE CHRISTOPHER C. CONNER
v.	:	
	:	<i>Electronically Filed</i>
DAUPHIN COUNTY, <i>et al.</i> ,	:	
Defendants	:	JURY TRIAL DEMANDED

## AFFIDAVIT OF NON-INVOLVEMENT

I, **Carl A. Hoffman Jr., DO**, hereby state under penalties of perjury the following is true and correct to the best of my information, knowledge and belief:

1. I was the owner of PrimeCare Medical, Inc. and held the position of Corporate Medical Director through January 28, 2019.

2. On January 29, 2019, I retired and sold my ownership interest in PrimeCare Medical, Inc.

3. I am aware that the Plaintiff in the above-captioned matter has brought a claim against me arising from the medical care provided to Jimmy King at the Dauphin County Prison.

4. I did not provide any direct patient care or have any personal knowledge of or involvement with the care provided to Jimmy King during August 2020 at the Dauphin County Prison.

5. I had no supervisory role with PrimeCare Medical, Inc. after I sold my interest in the company.

6. I did not have any role in policy creation, revision, or supervision after I sold my interest in PrimeCare Medical, Inc.

Carl A. Hoffman Jr., D.O.

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Carl A. Hoffman Jr., DO

Dated: 5.28.23

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 29<sup>th</sup> day of March, 2023, the foregoing *Affidavit of Non-Involvement* was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel of record, which service satisfies the requirements of the Federal Rules of Civil Procedure.

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By: /s/John R. Ninosky  
John R. Ninosky